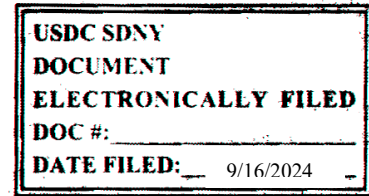


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X



Graham et al.,

Plaintiffs,

ORDER RE STATUS CONFERENCE

-against-

7:23-cv-7692 CS-VR

Vassar College,

Defendant.

-----X

VICTORIA REZNIK, United States Magistrate Judge:

A Status Conference (via telephone) is hereby scheduled for **October 15, 2024 at 11:00**

AM. The parties are to dial in to the ATT conference line at 877-336-1839, enter access code **5999739** and then # to enter the conference. Please submit the attached Case Management Plan three business days prior to the conference (October 9, 2024). At the Status Conference, the parties should be prepared to discuss the following:

- (1) a brief summary of claims, defenses, and relevant issues;
- (2) the basis of subject matter jurisdiction;
- (3) the subjects on which discovery may be needed;
- (4) any anticipated discovery disputes or sought-after limitations on discovery;
- (5) any plans for electronic discovery and ESI protocols;
- (6) any plans for confidentiality orders and orders relating to Fed. R. Evid. 502(d);
- (7) any anticipated motions; and
- (8) the prospects and timing for early settlement or resolution.

SO ORDERED.

DATED: White Plains, New York
September 16, 2024



VICTORIA REZNIK
United States Magistrate Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

Plaintiff(s),

**CIVIL CASE MANAGEMENT PLAN
AND SCHEDULING ORDER**

v.

—Civ. _____ (VR)

Defendant(s).

-----X

This Civil Case Management Plan and Scheduling Order is adopted, after consultation with counsel and any unrepresented parties, pursuant to Rules 16 and 26(f) of the Federal Rules of Civil Procedure:

1. **Jury/Non-Jury.**

This case [is] [is not] to be tried to a jury (circle one).

2. **Amendment/Joinder.**

The parties may amend the pleadings or join additional parties before _____.

3. **Initial disclosures.**

Initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure must be completed by _____.

4. **Fact Discovery.**

The parties will conduct discovery in accordance with the Federal Rules of Civil Procedure, the Local Rules of the Southern District of New York, and Judge Reznik's Individual Practices. The interim deadlines in paragraphs 4(b) through 4(e) may be extended by the parties on consent without application to the Court, provided the parties meet the fact discovery completion date in paragraph 4(a).

a. **Fact Discovery Deadline.**

All fact discovery must be completed by _____.

b. **Requests for Production.**

Initial requests for production of documents must be served by _____.
Any subsequent requests for production must be served no later than 45 days before the fact discovery deadline.

c. **Interrogatories.**

Interrogatories must be served by _____.
Any subsequent interrogatories must be served no later than 45 days before the fact discovery deadline.

- d. **Fact Depositions.**
Non-expert depositions must be completed by _____.
Absent an agreement between the parties or an order from the Court, non-party depositions must follow initial party depositions.
 - e. **Requests to Admit.**
Requests to admit must be served by _____, and in any event no later than 45 days before the fact discovery deadline.
5. **Settlement/ADR.**
All counsel must have at least one substantive joint discussion at least two weeks before the next Case Management Conference before Judge Seibel. If at any time the parties believe the assistance of a Magistrate Judge or court mediator for settlement purposes would be helpful, they should so advise the Court by letter.
6. **Expert Discovery.**
- a. **Expert Discovery Deadline.**
All expert discovery, including expert depositions, must be completed by _____.
 - b. **Plaintiff's Expert Reports.**
Plaintiff's expert disclosures pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure must be made by _____.
 - c. **Defendant's Expert Reports.**
Defendant's expert disclosures pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure must be made by _____.
 - d. The interim deadlines in paragraphs 6(b) and 6(c) may be extended by the written consent of all parties without application to the Court, provided that all expert discovery is completed by the date set forth in paragraph 6(a).
7. **ALL DISCOVERY MUST BE COMPLETED BY _____.**
(Absent exceptional circumstances, this date should align with the completion of all expert discovery in paragraph 6(a).)
8. **Summary Judgment Motions.**
Any party contemplating a motion for summary judgment must submit a pre-motion letter, in accordance with Judge Seibel's Individual Practices, at least two weeks before the next Case Management Conference before Judge Seibel, and the opposing party must respond at least one week before that conference date.

If no motions are contemplated, a date for trial—or, if Judge Seibel's schedule does not permit a firm date, a date by which the parties should be ready for trial on 48 hours' notice (or on such other notice as Judge Seibel may prescribe)—will be set at the Case Management Conference. Dates for the submission of the Joint Pretrial Order, motions *in*

limine, proposed *voir dire* questions, and requests to charge will also be set at the conference. The parties should be prepared for at least the Joint Pretrial Order to be due 30 days after the close of discovery.

9. **Estimated length of trial.**

The parties have conferred and their present best estimate of the length of the trial is _____.

10. This Civil Case Management Plan and Scheduling Order may not be modified or the dates herein extended without leave of the Court (except as provided in paragraphs 4 and 6(d) above).

Dated:

White Plains, NY

SO ORDERED.

VICTORIA REZNIK
United States Magistrate Judge